

JS 44 (Rev. 12/07)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

Fred and Madeline Rullo

(b) County of Residence of First Listed Plaintiff Chester  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

See Attached Sheet

**DEFENDANTS**

Wells Fargo Bank, N.A.

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Overpayment of Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury  <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability  <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act  <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
15 U.S.C. 1692

Brief description of cause:  
Violation of the Fair Debt Collection Practices Act

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$**  
25,000.00

CHECK YES only if demanded in complaint:  
**JURY DEMAND:** ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE 8/24/11

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

FRED P. RULLO, JR., and	:	CIVIL ACTION
MADELINE RULLO	:	
v.	:	
WELLS FARGO BANK, N.A.	:	NO.
	:	

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

<u>08/23/2011</u>	<u>Thomas P. Hogan, Esquire</u>	<u>Plaintiffs</u>
<b>Date</b>	<b>Attorney-at-law</b>	<b>Attorney for</b>
<u>(610) 430-8000</u>	<u>(610) 692-6210</u>	<u>thogan@lambmcerlane.com</u>
<b>Telephone</b>	<b>FAX Number</b>	<b>E-Mail Address</b>

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 321 Applebrook Drive, Malvern, PA 19335

Address of Defendant: 420 Montgomery Street, San Francisco, CA 94104

Place of Accident, Incident or Transaction: Repeated telephone calls in violation of Fair Debt Collectors Practices Act at Plaintiffs' leased residence in Chester County, PA.  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases

(Please specify) Violation of Fair Debt Collector Practices Act

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify)

### ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Thomas P. Hogan, Esquire

counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: 8/23/2011

Attorney-at-Law

67116

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 8/24/11

Attorney-at-Law

67166

Attorney I.D.#

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRED P. RULLO, JR., and	:	
MADELINE RULLO	:	
	:	CIVIL ACTION NO.
Plaintiffs,	:	
	:	
v.	:	JURY TRIAL DEMANDED
	:	
WELLS FARGO BANK, N.A.	:	
	:	
Defendant.	:	

**I.     INTRODUCTION**

1.       This is an action for actual and statutory damages brought by Plaintiffs Fred P. Rullo, Jr., and Madeline T. Rullo, individual consumers, against Defendant Wells Fargo Bank, N.A. (hereinafter “Wells Fargo” or “the Bank”) for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (hereinafter “FDCPA”), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

**II.    JURISDICTION**

2.       Jurisdiction of this court arises under 15 U.S.C. § 1692 and 28 U.S.C. § 1337. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202.

3.       Venue in this District is proper in that the Defendant transacts business here, Plaintiffs leased a residence here, and the conduct complained of occurred here.

**III.   PARTIES**

4.       During the course of conduct complained of herein, Plaintiffs Fred P. Rullo, Jr., and Madeline Rullo leased a residence at 321 Applebrook Drive, Malvern, Pennsylvania 19335.

5. Defendant Wells Fargo Bank, N.A. (“Wells Fargo”), is a Delaware corporation regularly engaged, *inter alia*, in the business of collecting debt in the Commonwealth of Pennsylvania with its principal place of business located at 420 Montgomery Street, San Francisco, California 94104.

6. Defendant is engaged in the collection of debts from consumers using the mail and telephone. Defendant is a debt collector as defined by the FDCPA, 15 U.S.C. § 1692a(6).

#### **IV. FACTS**

7. Plaintiffs own a residence located in Arden, North Carolina (the “Residence”).

8. To purchase the Residence, Plaintiffs sought and obtained a mortgage (the “Mortgage”) from Wells Fargo.

9. Plaintiffs complied with the terms of the Mortgage, making regularly scheduled payments to Wells Fargo.

10. However, along with millions of Americans, Plaintiffs experienced severe financial distress during the economic downturn in 2008 and 2009.

11. Because of the attendant consequences of the Plaintiffs’ severe financial distress, Wells Fargo alleged that Plaintiffs were delinquent in complying with the mortgage.

12. In the summer of 2010, representatives from the Bank began telephoning Plaintiffs on a near-daily basis in an attempt to collect on alleged debts owed to Wells Fargo by Plaintiffs.

13. In response to the daily calls from the Bank, Plaintiffs retained Vincent T. Donohue, Esquire of Lamb McErlane, PC, in West Chester, Pennsylvania to work with Wells Fargo to resolve any and all alleged claims.

14. On or about July 19, 2010, Plaintiffs' counsel notified Wells Fargo in writing that he had been retained to represent Plaintiffs. Per Wells Fargo's instructions, Plaintiffs' counsel completed and faxed a Wells Fargo-issued authorization form to the contact number provided by Wells Fargo, notifying Wells Fargo of his representation of the Plaintiffs. A copy of the transmission of the authorization is attached hereto as **Exhibit "A"**.

15. The purpose of the authorization form was to evidence the Plaintiffs' permission for the Bank to discuss the matter with Plaintiffs' counsel.

16. Despite complying with the Bank's procedures, representatives from the Bank frequently continued to call Plaintiffs demanding repayment of alleged debts. Plaintiffs repeatedly informed the Bank's representatives that they should direct all calls to their counsel.

17. Because the Bank failed to adhere to the Plaintiffs' instructions to direct all calls to their counsel, in October 2010, Plaintiffs' counsel called the Bank to reiterate counsel's representation of the Plaintiffs, during which call the Bank's representative asked counsel to re-submit the form.

18. In October 2010, Plaintiffs' counsel re-completed and faxed the Wells Fargo-issued form notifying Wells Fargo of his representation of the Plaintiffs, and requesting that all contact from the Bank be made through him. Along with the new authorization form, Plaintiffs' counsel re-submitted the form previously submitted in July 2010. A copy of the October transmission of the authorization is attached hereto as **Exhibit "B"**.

19. During this time period, Plaintiffs' attorney had several conversations with officials with Wells Fargo and repeatedly informed the Bank that all communication regarding the Mortgage should be through Plaintiffs' attorney, and not directly to the Plaintiffs.



20. In order to disguise the identity and purpose of the calls, Wells Fargo used multiple representatives from multiple telephone numbers during their frequent and repeated telephone calls to the Plaintiffs.

21. Ignoring the requests from Plaintiffs and their attorney, and seeking only to harass and annoy Plaintiffs, Wells Fargo has continued to carry out their telephone campaign against the Plaintiffs, including calling on Saturdays, Sundays, and even calling multiple times per day.

22. By way of example, over ten days in March 2011 – eight months after being notified that Plaintiffs were represented by counsel – Wells Fargo telephoned Plaintiff Fred Rullo, Jr. ten times on his cell phone alone, including twice on March 8, 2011, twice on March 10, 2011, and on Sunday March 13, 2011. Each of these calls occurred *after* Wells Fargo had been notified that Plaintiffs' had retained counsel, and *after* Plaintiffs had repeatedly informed Wells Fargo to cease calls directly to Plaintiffs.

23. Plaintiffs notified Wells Fargo in July 2010 and October 2010 via their attorney's execution of a form provided by Wells Fargo, as well as personally notifying Wells Fargo's numerous times during Wells Fargo's hundreds of telephone calls to Plaintiffs, that all contact should be through Plaintiffs' attorney.

24. The harassment continued into May 2011.

25. On Monday, May 2, 2011, David Mickus, an attorney with Shapiro Ingle in Asheville, North Carolina, representing Wells Fargo, called Plaintiffs' counsel to discuss a resolution; thus, at this point, Plaintiffs' counsel and Wells Fargo's outside counsel were discussing the matter on behalf of their respective clients.

26. As a result, through its agent Shapiro Ingle, Wells Fargo clearly was aware that the Rullos were represented by counsel.

27. Nevertheless, in clear violation of the FDCPA (and the ethical cannons governing lawyers), on May 4, 2011, attorney Jeff Bunda of Shapiro Ingle, a colleague of David Mickus, bypassed Plaintiffs' counsel and called Plaintiffs directly to demand payment of the debt.

28. Plaintiff Fred Rullo replied to Bunda, again reminding Mr. Bunda that Plaintiffs were represented by counsel.

29. On May 5, 2011, Plaintiffs' counsel replied to Bunda, admonishing him to cease direct contact with the Plaintiffs.

30. As a result of the acts above, Plaintiffs have and continue to incur physical and emotional distress, including headaches, nausea, and embarrassment.

**COUNT I**  
**VIOLATION OF THE FDCPA**  
**15 U.S.C. § 1692**

31. Plaintiffs repeat and incorporate by reference the foregoing paragraphs.

32. Defendant Wells Fargo violated the FDCPA. Defendants' violations include, but are not limited to, the following:

- a. Engaging Plaintiffs in telephone conversation repeatedly or continuously with intent to annoy, abuse, or harass Plaintiffs at both Plaintiffs' cell phone number and home telephone number;
- b. Engaging Plaintiffs in telephone calls at times which Wells Fargo knew to be inconvenient because Plaintiffs repeatedly requested that Wells Fargo cease calling them, and make all contact through Plaintiffs' attorney; and

33. Contacting Plaintiffs despite being aware that Plaintiffs are represented by an attorney with respect to the Mortgage, and being aware of Plaintiffs' attorney's name and



address from July 2010 the present; Wells Fargo's conduct has caused Plaintiffs physical and emotional distress.

34. As a result of the foregoing violations of the FDCPA, Defendant Wells Fargo Bank, N.A., is liable to the Plaintiffs for declaratory judgment that the Defendant's conduct violated the FDCPA, actual damages, statutory damages, costs and attorney's fees.

WHEREFORE Plaintiffs Fred P. Rullo, Jr., and Madeline Rullo respectfully request that judgment be entered against Defendant Wells Fargo, N.A. for the following:

- A. Declaratory judgment that the Defendant's conduct violated the FDCPA;
- B. Actual damages in the sum of \$25,000;
- C. Statutory damages pursuant to 15 U.S.C. § 1692;
- D. Costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1692;
- E. Injunctive relief enjoining Defendant from contacting Plaintiffs regarding any and all alleged debts; and
- F. For such other and further relief as the Court may deem just and proper.

Respectfully submitted,

**LAMB McERLANE PC**

Dated: August 23, 2011

By: Thomas P. Hogan, Jr.  
William H. Lamb (No. 04927)  
Thomas P. Hogan, Jr. (No. 67166)  
David A. Gomez (No. 209627)  
24 E. Market St., Box 565  
West Chester, PA 19381-0565  
(610) 430-8000

*Attorneys for Plaintiffs Fred P. Rullo, Jr.,  
and Madeline Rullo*

# EXHIBIT A



## Authorization to Inquire Form

Must be filled out completely by account holder	Date: 7/14/10	New Authorization: <input checked="" type="checkbox"/>	Cancel Existing Authorization: <input type="checkbox"/>
	Customer Name: Fred & Madeleine Rullo		Account Numbers: # 75 2245 0000001 # 000 5988 5816
	Customer Address: 321 Applebrook Drive		City, State, & Zip: Malvern, PA 19355
	Customer Phone:		
Borrower's Signature Required	 Borrower Signature Date: 7/16/2010		
Third Party Information	Name: Vincent T. Donohue, Esquire		Last 4 digits of SSN: 1500
	Address: 22 B. Market Street		City, State, & ZIP: West Chester, PA 19382
	Phone: 610-701-4429		
Third Party Signature	 Third Party Signature Date: 7/14/2010		
Disclosure	Disclosure Statement: This authorization allows limited informational access to your account for the third party listed. This authorization does not provide to advance any available credit or make financial decisions regarding this account. The third parties may be asked to provide personal information to verify identity if a call is made to request specific information about your account. Wachovia Home Equity Solutions may refuse to disclose any information to a third party who cannot verify his or her secure information.		

Please return to:

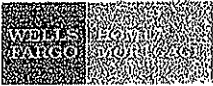
FAX

Wells Fargo Home Equity Solutions

1-866-834-7648

(602) 328-5720

# **EXHIBIT B**



Return Mail Operations  
P.O. Box 10368  
Des Moines, IA 50306-0368

October 04, 2010

007963 1 MB 0.362 7043/007963/018552 035 01 AC03X9 DP018 706

Vincent T Donahue Esq  
24 E Market St  
West Chester PA 19382-3151



Dear Vincent T Donahue Esq:

RE: Attorney Representation  
Loan Number 0008988386, Client 708  
Borrower: Fred P Rullo Jr  
Co-Borrower: Madeline T Rullo

It is our understanding that you have been retained by the above customer.

Please complete the information below and return to our office as soon as possible so that we may follow-up with this file. This information can be faxed to (866) 917-1877.

Primary contact at attorney firm: VINCENT T. Donahue

Reference number (if applicable): NONE

Phone Number: (610) 701-4429

Reason for Representation: General representation,  
including in connection with Borrowers'

Thank you. loans from Wells Fargo, identified  
as loan numbers:

① 7522245-0000001

② 0008988386

See attached authorization, which was sent  
to Wells Fargo on July 14, 2010.

*V. T. Donahue*



P. 1

\* \* \* Communication Result Report ( Jul. 19. 2010 8:47AM ) \* \* \*

1} Lamb McErlane PC  
2}

Date/Time: Jul. 19. 2010 8:46AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
1257 Memory TX	18668347648	P. 2	OK	

Reason for error  
 E. 1) Hang up or line fall  
 E. 2) No answer  
 E. 3) Exceeded max. E-mail size

E. 2) Busy  
 E. 4) No facsimile connection



LAW OFFICES OF LAMB McERLANE PC  
 24 EAST MARKET STREET, SUITE 505, WEST CHESTER, PA 19381-4565

Vincent T. Donohue  
 Voice (610) 692-8000  
 Fax (610) 692-6210  
 vtdonohue@lambmcerlane.com

July 19, 2010

PLEASE DELIVER IMMEDIATELY TO:

Wachovia Home Equity - Wells Fargo Home Equity  
 Attn: Christopher Gallatin

Re: Fred &amp; Madeleine Rullo

(866) 834-7648

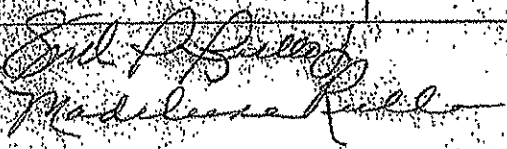

Number of Pages Including Cover

2





## Authorization to Inquire Form

Must be filled out completely by account holder	Date: 7/14/10	New Authorization: <input checked="" type="checkbox"/>	Cancel Existing Authorization: <input type="checkbox"/>
	Customer Name: Fred & Madeleine Rullo		Account Numbers: # 7522450000001 # 000.5982380
	Customer Address: 321 Applebrook Drive		City, State, & Zip: Malvern, PA 19355
	Customer Phone:		
Borrower's Signature Required	 Borrower Signature		Date: 7-18-2010
	Third Party Information Name: Vincent T. Donohue, Esquire Address: 24 E. Market Street Phone: 610-701-4429		Last 4 digits of SSN: 1502 City, State, & ZIP: West Chester, PA 19382
Third Party Signature	 Third Party Signature		Date: 7/14/2010
Disclosure	Disclosure Statement: This authorization allows limited informational access to your account for the third party listed. This authorization does not provide to advance any available credit or make financial decisions regarding this account. The third parties may be asked to provide personal information to verify identity if a call is made to request specific information about your account. Wachovia Home Equity Solutions may refuse to disclose any information to a third party who cannot verify his or her secure information.		

Please return to:	FAX
Wells Fargo Home Equity Solutions 1-866-834-7648 & (602) 328-5720	